

Omaha Public Power District
1623 Harney Omaha, Nebraska 68102-2247
402/536-4000

June 3, 1988
LIC-88-377

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

References: 1. Docket No. 50-285
2. Letter from NRC (L. J. Callan) to OPPD (R. L. Andrews) dated
April 19, 1988

Gentlemen:

SUBJECT: Response to Notice of Violation
NRC Inspection Report 50-285/88-10

Omaha Public Power District (OPPD) recently received Reference 2, Notice of Violation, issued as a result of the subject inspection report. This report identified two violations. The violations involved the failure to promptly resolve test deficiencies and the failure to use correct qualification level of examiner for surveillance test evaluation. The response to these violations may be found in Attachment A. Also identified was a deviation concerning the failure to continue implementation of corrective actions. The response to this deviation is found in Attachment B. A two week extension was discussed between Mr. Jim Fisicaro of my staff and Mr. Tom Westerman of Region IV.

Pursuant to 10 CFR Part 2.201, please find attached OPPD's response to the violations and deviation. If you have any questions concerning this matter, please contact us.

Sincerely,

for R. L. Andrews
R. L. Andrews
Division Manager
Nuclear Production

RLA/me

Attachment

cc: LeBoeuf, Lamb, Leiby & MacRae
R. D. Martin, NRC Regional Administrator
P. D. Milano, NRC Project Manager
P. H. Harrell, NRC Senior Resident Inspector

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Attachment A

Response to Notice of Violation

During an NRC inspection conducted from March 14-18, 1988, two violations of NRC requirements were identified. The violations involved failure to promptly resolve deficiencies identified during a surveillance test and failure of the licensee to verify the correct qualifications for an examiner completing a reactor coolant system leak test. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions", 10 CFR Part 2, Appendix C (1987), the violations are listed below:

A. Failure to Promptly Resolve Test Deficiencies

Criterion XI of Appendix B of 10 CFR Part 50 and the licensee's approved quality assurance program requires that a test program shall be established to assure that . . . systems and components will perform satisfactorily. This criterion also requires that test results shall be documented and evaluated to assure that test requirements have been satisfied.

Contrary to the above, Surveillance Test ST-NZ-1 was completed on May 8, 1987, with anomalies or deficiencies involving 11 nozzles. There was not an evaluation started of these anomalies or deficiencies until March 15, 1988.

This is a Severity Level IV violation. (Supplement I) (285/8810-01)

OPPD'S RESPONSE

Reason for Violation if Admitted

The reason for the violation was inadequate followup to surveillance tests which were not completed, reviewed, and filed. This was also cited as deviation 285/8810-03.

In the case of this specific surveillance test, the "backsheets" had been turned in, but the entire review process was not complete. The backsheet is a separate page of the surveillance test which is turned in to a surveillance test clerk upon completion of the test. This information is used by the surveillance test clerk to compile information for the delinquent surveillance test listing. The assumption made was that the test was somewhere in the review process. What was not known from the Delinquent Surveillance Test Listing (and what was assumed not to exist) were the anomalies noted in the violation. The first two reviewers were aware of these anomalies, and had informally analyzed the anomalies as inconsequential, but this conclusion was not formally documented. Since neither of the first two reviewers documented the anomalies in the station incident reporting process, management was not aware the anomalies existed.

Additional contributing factors to the violation include:

1. Assignment of a very junior engineer to perform the surveillance test. This individual, while technically competent, was unaware that the anomalies should have been documented in the station's incident reporting process.

Attachment A (Continued)

2. During the review phase of this test, the Quality Control Department was relocated. The test was lost during this move.

Corrective Steps Taken and Results Achieved

ST-NZ-1 was found and the test review was completed. The anomalies were documented in the station's incident report system. The anomalies were evaluated, and the results were submitted to the NRC in Licensee Event Report 88-008, Dated April 14, 1988.

When it was discovered that this surveillance test had not been actively reviewed but rather had been lost, a review of other outstanding surveillance tests was conducted to ensure other tests were either completely reviewed, or were properly under review without anomalies. Results of this review are that surveillance tests older than 30 days have been reviewed and filed or documentation has been supplied to the PRC Chairman justifying the outstanding tests. Any anomalies discovered were addressed in the station incident reporting process. Additionally, during the review it was determined that ST-DC-1 had not been properly performed within its Technical Specification frequency. This was documented and reported to the NRC in Licensee Event Report 88-006, dated April 14, 1988.

Corrective Steps That Will be Taken to Avoid Further Violations

Specific actions concerning ST-NZ-1 are as described in LER-88-008, dated April 14, 1988. Additional actions related to the generic aspects of the surveillance test review process are as described in the response to deviation 50-285/8810-03 as found in Attachment B of this letter.

Date When Full Compliance Will be Achieved

OPPD is currently in full compliance. Programmatic enhancements as described in Attachment B will be made by August 1, 1988

B. Failure to Use Correct Qualification Level of Examiner for Surveillance Test Evaluation

Section 5.8.1 of the Technical Specifications (TS) requires that written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the minimum requirements of Section 5.1 and 5.2 of ANSI N18.7-1972. Table 1 of G-26 of the licensee's Standing Order G-26, R17, "Maintenance Quality Control Program," requires a minimum Level II capability for personnel who evaluate and report test results.

Contrary to the above, Surveillance Test ST-RLT-1, F.1 (leak test) results were evaluated and reported on May 29, 1987, by an individual qualified to a lower capability level (Level I).

This is a Severity Level IV violation. (Supplement I) (285/8810-02)

Attachment A (Continued)

OPPD's RESPONSE

Reason for Violation if Admitted

OPPD denies the violation as stated. Although the Surveillance Test ST-RLT-1, F.1 was signed off as complete by two engineers who did not meet the requirements as Level II visual test examiners, the actual examiners used to verify the NDE portion of the test were fully qualified QC inspectors. These inspections were documented on QC log sheets in accordance with Standing Order G-26A. This information was not available and was therefore not provided to the inspector during the time he was on site conducting this inspection.

Corrective Steps Taken and Results Achieved

None Required

Corrective Steps That Will be Taken to Avoid Further Violations

Although no violation occurred, it is common practice to have QC signoff in the surveillance test document in addition to the QC log sheet documentation. ST-RLT-1 will be revised to include signoffs by the QC Inspector performing the visual inspection thus eliminating any potential of misinterpretation in the future. This revision will be completed prior to performing this test during the 1988 refueling outage.

Date When Full Compliance Will be Achieved

OPPD is currently in full compliance.

Attachment B

Response to Deviation

During an NRC inspection conducted from March 14-18, 1988, a deviation from a previous OPPD commitment was identified. The deviation consisted of failure to continue implementation of corrective actions committed to in the response to an NRC violation. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions", 10 CFR part 2, Appendix C (1987), the deviation is listed below:

Failure to Continue Implementation of Corrective Actions

Violation 285/8511-01, dated June 26, 1985, involved failure to account for six surveillance tests (STs), performed during the refueling outage ending in July 1984, in the files. The licensee's response to this violation stated, in part, "Each month the surveillance test clerk will issue a list of STs that are due but not filed and those due but not completed. Each supervisor will be required to respond to this list by indicating the status of each test. This status list will then be compiled and presented to the Plant Review Committee (PRC) by the Supervisor-Technical indicating those tests not completed/not filed and the action taken to assure completion/filing by the end of the next monthly review period."

Contrary to the above, in deviation to that written commitment, a delinquent ST list dated March 2, 1988, showed 11 STs dating from August 22, 1986, through the end of the 1987 spring refueling outage, as being delinquent for filing. (285/8810-03)

OPPD's RESPONSE

Reason for the Violation if Admitted

Untimely reviews of completed surveillance tests, caused by lack of attention to the importance of OPPD's commitment, led to the delinquency in filing the necessary paperwork. It has been verified, however, that the 11 surveillance tests identified above were performed as scheduled. One test, ST-NZ-1, although performed as scheduled, involved deficiencies that did not receive timely evaluation. For more information on ST-NZ-1, see Notice of Violation 285/8810-01 and OPPD's response found in Attachment A.

Corrective Steps Which Have Been Taken and the Results Achieved

Upon being notified of this deviation, OPPD reviewed the status of these 11 surveillance tests and verified that all eleven STs were performed as scheduled. The required paperwork has since been turned in for seven surveillance tests, allowing them to be removed from the delinquent list. Incident Reports (IRs) have been written on the other four surveillance tests. Three of the surveillance tests had sections of the paperwork lost, i.e., supporting calibration procedures. The fourth one, ST-NZ-1, is the subject of Violation 50-285/8810-01 and LER-88-008. The IR process will analyze the safety significance and document the follow-up actions necessary to close out the four affected surveillance tests. A preliminary safety analysis has been performed for the three that involved lost paperwork and determined that there were no safety concerns as a result of the lost documentation.

Attachment B (Continued)

At the time that the deviation was identified, a new surveillance test tracking program had been recently implemented (on February 1, 1988) to help ensure that all surveillance tests are completed on time. At each maintenance planning meeting, the list of surveillance tests due on that day and in the next four days is distributed and reviewed by supervisors and foremen. When a surveillance test is completed, the back sheet is forwarded directly to a designated surveillance test-tracking individual, who enters the surveillance test into a database as being complete. The status of surveillance tests can be quickly and accurately obtained from the database. A list of delinquent surveillance tests is generated from the database and also distributed at each meeting. This new mechanism ensures that delinquent surveillance test is identified and brought to the attention of the responsible supervisor in the maintenance meeting at the earliest possible opportunity.

In addition to the action taken on the eleven refueling STs, a major effort has been conducted to eliminate the backlog of delinquent reviews of other STs. This effort has resulted in identifying five other STs for which the paperwork is missing, although it was confirmed that the tests had been reviewed by the appropriate craft supervisors. As in the case above, IRs have been issued for these five tests and safety evaluations have been completed. Currently, there are no STs on the delinquent list completed earlier than May 5, 1988. The investigation has also confirmed that the STs were performed and no other problems (as in the case of ST-NZ-1) with the adequacy of the tests were identified.

Corrective Steps Which Will Be Taken to Avoid Further Violations

OPPD believes that the basic issue has been the failure to establish when a ST is acceptable, i.e., we have not clearly defined when a ST is considered complete. In order to ensure that the Surveillance Test program is being properly conducted, two major actions are planned. First, a requirement for the first line supervisor to review and certify adequacy of the test will be added to the Surveillance Test backsheet. The backsheet would still be required to be submitted within 24 hours of the test completion; thus, ensuring that a responsible supervisor conducts a timely review of the ST. A second measure is the upgrade of our current practice of pre-job briefings. OPPD currently requires pre-job briefings of STs that are performed at intervals of quarterly or longer. This process would be upgraded to provide specific guidance to the supervisors on what should be covered during these briefings. Specifically, the acceptance criteria for the tests would be identified and actions required when outside this acceptance criteria would be stressed. These two measures would ensure that once the backsheet is submitted, there is documented evidence that the STs have been properly performed.

As a longer term effort, OPPD has initiated a major project to upgrade plant procedures and as part of this upgrade, STs will be reviewed for the adequacy of acceptance criteria. This effort will provide for significantly improved procedures.

Date When Full Compliance Will Be Achieved

OPPD is currently in full compliance.